

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:	)	
	)	Case No. 25-04834
JORGE NEGRETE,	)	
Debtor(s)	)	Chapter 7
	)	Judge Timothy A. Barnes

**NOTICE OF MOTION**

To: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on **June 25, 2025 at 9:00 AM**, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, either in **Courtroom 744** of the **Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604**, or electronically as described below, and present the motion of **Debtors to Convert case from Chapter 7 to Chapter 13**, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

You may appear electronically by video or by telephone.

**To appear by video**, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

**Meeting ID and passcode.** The meeting ID for this hearing is: **161 329 5276 and the passcode is 433658**. The meeting ID and passcode can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

/s/ Vaughn White  
Vaughn White  
VW LAW LLC  
Attorney for Debtor(s)  
1755 Park St, Suite 200  
Naperville, IL 60563  
312-888-0131  
ARDC # 6198291

CERTIFICATE OF SERVICE

I, Vaughn A. White, an attorney, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on June 16, 2025.

/s/ Vaughn White  
Vaughn White

In re:  
Jorge Negrete  
Debtor

Case No. 25-04834-TAB  
Chapter 7

## CERTIFICATE OF NOTICE

District/off: 0752-1

User: admin

Page 1 of 2

Date Rcvd: Mar 31, 2025

Form ID: 309A

Total Noticed: 10

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Apr 02, 2025:

Recip ID	Recipient Name and Address
db	+ Jorge Negrete, 4847 155th St, Oak Forest, IL 60452-3534
31364085	DEPT OF ED/AIDVANTAGE, 1600 TYSON BOULEVARD, ST, MCLEAN, VA 75403

TOTAL: 2

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
aty	Email/Text: vaughn@vaughnwhite.com	Mar 31 2025 23:44:00	Vaughn A White, Vw Law LLC, 1700 Park St, Suite 203, Naperville, IL 60563
tr	+ EDI: BADMOGLIA	Apr 01 2025 03:26:00	Alex D Moglia, ESQ, Moglia Advisors, 1325 Remington Rd, Ste H, Schaumburg, IL 60173-4815
31364083	+ EDI: CAPITALONE.COM	Apr 01 2025 03:26:00	CAPITAL ONE BANK USA, PO BOX 31293, SALT LAKE CITY, UT 84131-0293
31364084	+ EDI: CAPITALONE.COM	Apr 01 2025 03:26:00	CAPITAL ONE/CABELAS, PO BOX 31293, SALT LAKE CITY, UT 84131-0293
31364086	+ EDI: PHINAMERI.COM	Apr 01 2025 03:26:00	GM FINANCIAL, PO BOX 181145, ARLINGTON, TX 76096-1145
31364087	+ EDI: IRS.COM	Apr 01 2025 03:26:00	Internal Revenue Service, Centralized Insolvency Operation, Post Office Box 7346, Philadelphia, PA 19101-7346
31364088	+ Email/Text: mtgbk@shellpointmtg.com	Mar 31 2025 23:44:00	SHELLPOINT MORTGAGE, 601 OFFICE CENTER DR STE, FORT WASHINGTON, PA 19034-3275
31364089	+ EDI: SYNC	Apr 01 2025 03:26:00	SYNCB/ASHLEY HOMESTORE, PO BOX 71757, PHILADELPHIA, PA 19176-1757

TOTAL: 8

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the

District/off: 0752-1

User: admin

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Date Rcvd: Mar 31, 2025

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**complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Apr 02, 2025

Signature: /s/Gustava Winters

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## CM/ECF NOTICE OF ELECTRONIC FILING

**The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 31, 2025 at the address(es) listed below:**

Name	Email Address
Adam G. Brief	Ustpreion11.es.ecf@usdoj.gov
Alex D Moglia, ESQ	amoglia@mogliaadvisors.com IL31@ecfbis.com
Vaughn A White	on behalf of Debtor 1 Jorge Negrete vaughn@vaughnwhite.com vaughn@vaughnwhite.com;paralegal@vaughnwhite.com;VWLAWLLC@jubileebk.net

TOTAL: 3

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:	)	
	)	Case No. 25-04834
JORGE NEGRETE,	)	
Debtor(s)	)	Chapter 7
	)	Judge Timothy A. Barnes

**MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13**

NOW COMES the Debtor, Jorge Negrete, by attorney Vaughn A. White, and moves this court pursuant to 11 USC Section 706(a) to convert this matter to Chapter 13 proceeding in support thereof states as follows:

1. The Debtor in this cause proceeded under Chapter 7 during which time it was determined the debtor's equity in his vehicle is \$18,737.00.
2. The Debtor is not able to purchase the equity from the estate, thereby necessitating a conversion to Chapter 13.
3. The Debtor is acting in good faith requesting conversion to Chapter 13 both to preserve his vehicle and to repay creditors under a Chapter 13 plan.

Respectfully Submitted,

/s/ Vaughn A. White  
Vaughn A. White  
Attorney for Debtor

Vaughn A. White  
Illinois ARDC # 6198291  
VW LAW LLC  
Attorney for Debtor(s)  
1700 Park St., Suite 203  
Naperville, IL 60563  
630-429-9010  
vaughn@vaughnwhite.com